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Attorney for Defendant
SHERRY RENEE KINCADE

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 1:22-CR-00001-ADA
)	
Plaintiff,)	
)	STIPULATION TO CONTINUE
vs.)	SENTENCING DATE; ORDER
)	
SHERRY RENEE KINCADE)	DATE: September 25, 2023
)	TIME: 08:30 a.m.
)	COURT: Hon. Ana de Alba
Defendant.)	
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Counsel for Defendant Sherry Renee Kincade, by and through her counsel of record, Assistant Federal Defender Meghan D. McLoughlin, and Plaintiff United States of America, by and through its counsel of record, Assistant United States Attorney Brittany Gunter, hereby stipulate as follows:

1. By previous order, this case was set for sentencing on September 25, 2023.
2. By this stipulation, defendant now moves to continue sentencing until November 6, 2023. As this is a sentencing and a change of plea and admission have already been entered, no exclusion of time under the Speedy Trial Act is required.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) Defense counsel has been investigating various mitigation documents relevant to sentencing, including medical records regarding Ms. Kincade's medical conditions.

1 b) Ms. Kincade has been seeking treatment and referrals for various
2 conditions, and continues to have appointments and labs through the month of
3 September. The full follow-up of these conditions is important in considering Ms.
4 Kincade's history and characteristics under 18 U.S.C. § 3553(a), among other factors,
5 and the question of sentencing.

6 c) In addition, it is imperative that the nature of her conditions and required
7 treatment are accurately portrayed in the Presentence Investigation Report so that, in the
8 event of her incarceration, the Bureau of Prisons may effectively and efficiently designate
9 her to an appropriate institution and provide further treatment while she is serving her
10 term.

11 d) This is Ms. Kincade's first request for a continuance.

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1 e) Counsel for defendant believes that failure to grant the above-requested
2 continuance would deny her the reasonable time necessary for effective preparation,
3 taking into account the exercise of due diligence.

4 f) The government does not object to the continuance.

5 IT IS SO STIPULATED.
6

7 Respectfully submitted,

8 HEATHER E. WILLIAMS
9 Federal Defender

10 Dated: July 20, 2023

11 /s/ Meghan D. McLoughlin
12 MEGHAN MCLOUGHLIN
Assistant Federal Defender
Attorney for Defendant
SHERRY RENEE KINCADE

13 Dated: July 20, 2023

14 /s/ Brittany Gunter
15 BRITTANY GUNTER
Assistant United States Attorney

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18 IT IS SO ORDERED.

19 Dated: July 20, 2023

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UNITED STATES DISTRICT JUDGE